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Attorneys for Christina W. Lovato, Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA**

In re

DOUBLE JUMP, INC.

Debtor.

Lead Case No.: BK-19-50102-gs
(Chapter 7)

Substantively consolidated with:

19-50130-gs	DC Solar Solutions, Inc.
19-50131-gs	DC Solar Distribution, Inc.
19-50135-gs	DC Solar Freedom, Inc.

CHRISTINA W. LOVATO,

Plaintiff,

v.

AHERN RENTALS, INC. and XTREME
MANUFACTURING, LLC,

Defendants.

Adversary No.: 22-05001-gs

**TRUSTEE’S REPORT IN CONNECTION
WITH STATUS CONFERENCE
SCHEDULED FOR DECEMBER 9, 2022**

Christina W. Lovato, as chapter 7 trustee and plaintiff (“*Trustee*”) in the above-captioned adversary proceeding (“*Adversary*”), provides this report in connection with the status conference scheduled to be conducted by this Court on December 9, 2022.

1 **I. Status of Adversary Proceeding**

2 As reflected on the docket, the Trustee has filed an operative complaint, the above-
3 captioned defendants (“*Defendants*”) have filed an Answer (which includes affirmative defenses),
4 and the Court has entered a Scheduling Order [ECF No. 43].

5 **II. Status of Discovery**

6 Generally:

- 7 • The Parties have issued written discovery which has been responded to by the receiving
8 party. The Parties are in the process of meeting and conferring, orally and in writing, on
9 certain discovery issues.
 - 10 ○ To date, no party has sought judicial intervention on a discovery issue.
- 11 • The Parties have communicated about deposition discovery. The Trustee, with the
12 Defendants’ agreement, has scheduled depositions for December 28, 2022, January 30
13 and 31, 2023, and February 1, 2, and 3, 2023.

14 **III. Status of Dispositive Motions**

15 The Trustee filed a motion for partial summary judgment (“*MPSJ*”) but has voluntarily
16 withdrawn that motion without prejudice. The Trustee contemplates filing at least one dispositive
17 motion later in this proceeding, including but not limited to on the basis and subject matter set
18 forth in the Trustee’s MPSJ.

19 **IV. Scheduling Order and Fact Discovery**

20 The Scheduling Order, among other things, provides for fact discovery to be commenced
21 in time to be completed by February 28, 2023. The Trustee reasonably expects that she can
22 complete her fact discovery by this deadline, or in the alternative, contemplates potentially seeking
23 a relatively short extension of time.

24 **V. Mediation**

25 The Parties participated in a judicial settlement conference pre-suit, but did not reach a
26 consensual resolution. The Trustee, in good faith, is willing to have further settlement
27 communications with the Defendant whether informally or formally, through a judicial settlement
28 conference or private mediation.

1 **VI. Further Status Conference**

2 The Trustee respectfully requests that this Court set a status conference in mid-late January,
3 or as otherwise convenient for the Court.

4 DATED: December 6, 2022.

5 **HARTMAN & HARTMAN**

6 /s/ Jeffrey L. Hartman
7 Jeffrey L. Hartman, Esq.,
8 Attorney for Plaintiff Christina W. Lovato

9 **MELAND BUDWICK, P.A.**

10 /s/ Meaghan E. Murphy
11 Michael S. Budwick, Esq., Admitted Pro Hac Vice
12 Solomon B. Genet, Esq., Admitted Pro Hac Vice
13 Meaghan E. Murphy, Esq., Admitted Pro Hac Vice
14 Gil Ben-Ezra, Esq., Admitted Pro Hac Vice
15 Alexander E. Brody, Esq., Admitted Pro Hac Vice
16 Attorneys for Plaintiff Christina W. Lovato

CERTIFICATE OF SERVICE

I certify that on December 6, 2022, I caused to be served the following document(s):

**TRUSTEE'S REPORT IN CONNECTION WITH STATUS CONFERENCE
SCHEDULED FOR DECEMBER 9, 2022**

I caused to be served the above-named document(s) as indicated below:

✓ a. Via ECF to:

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✓ b. Direct Email to:

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✓ c. Via Mail Service: Regular, first-class United States mail, postage fully pre-paid,
addressed to:

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Las Vegas, NV 89106	Henderson, NV 89015

I declare under penalty of perjury that the foregoing is true and correct.

DATED: December 6, 2022.

/s/ Meaghan E. Murphy, Esq.
Meaghan E. Murphy, Esq.